

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

IN RE:

C&J SECURITY SERVICES, INC.

Debtor

Case No. 24-11886-BFK
Chapter 7

**TRUSTEE’S OBJECTION TO CLAIM 8
FILED ON BEHALF OF TRUIST BANK**

Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007, Janet M. Meiburger, Chapter 7 Trustee, by counsel, hereby files this Trustee’s Objection to Claim 8 Filed on behalf of Truist Bank (the “Objection”). In support of this Objection, the Trustee states as follows:

1. On October 9, 2024 (the “Petition Date”), the Debtor filed its voluntary petition for relief under Chapter 7 of the Bankruptcy Code. The Trustee was appointed on October 10, 2024 (Docket No. 10).

2. This objection is filed pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007. The Court has jurisdiction over this contested matter under Pursuant to 28 U.S.C. §§ 152 and 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(B). Venue is proper under 28 U.S.C. § 1409.

3. Claim 8 was filed on behalf of Truist Bank as a secured claim. The documentation attached to the claim does not include any documentation, such as a security agreement or financing statements, showing that Truist Bank has a secured claim.

4. The Trustee requested Truist Bank to provide documentation regarding its alleged

lien, but she did not receive the documentation.

5. In addition, the Claim 8 does not provide any explanation of how the amount was determined.

6. The Trustee is requesting that Claim 8 be disallowed as a secured claim and that it be disallowed as an unsecured claim unless an explanation is provided of how the amount was determined.

WHEREFORE, the Trustee respectfully requests that the Court enter an order disallowing Claim 8 as a secured claim and disallowing it as an unsecured claim unless an explanation is provided of how the amount was determined, and granting such other and further relief as the Court deems just and proper.

Respectfully submitted

THE MEIBURGER LAW FIRM, P.C.

Dated: June 20, 2025

By: /s/ Janet M. Meiburger

Janet M. Meiburger, Esq., VSB No. 31842
1487 Chain Bridge Road, Suite 200
McLean, Virginia 22101
(703) 556-7871
Counsel to Chapter 7 Trustee

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of June, 2025, a true and correct copy of the foregoing Trustee's Objection to Claim 8 Filed on behalf of Truist Bank will be served by ECF e-mail pursuant to the applicable Standing Order of the Court, and by first class mail, postage prepaid on the following:

Corporation Service Company
100 Shockoe Slip Fl 2
Richmond, VA 23219-4100
Registered Agent for Truist Bank

Truist Bank, Support Services
P.O. Box 85092
Richmond, VA 23286

and by certified mail on the following:

William H. Rogers, Jr.
Chief Executive Officer
Truist Bank
214 N. Tryon St.
Charlotte, NC 28202

/s/ Janet M. Meiburger

Janet M. Meiburger